Rob [redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
ALLIED BANK TOWER AT FOUNTAIN PLACE
1445 ROSS AVENUE
DALLAS, TEXAS 75202

APR 0 1 1988

MEMORANDUM

SUBJECT: Transmittal of RCRA Facility Assessment Summary

FROM: Erlece P. Allen, Chief
Technical Section (6H-CT) Erlece P. Allen

TO: William K. Honker, Chief
Permits Section (6H-CP)

Attached please find a copy of the following RCRA Facility Assessment Summary:

- Facility Name: CECOS International, Inc. - Odessa, Texas
- EPA I.D. Number: TXD091270017

Please advise us if more information is required and/or if you need further assistance.

Attachment

cc: Sam Becker (6H-C) - w/o Attachment

RCRA FACILITY ASSESSMENT SUMMARY

PRELIMINARY REVIEW AND VISUAL SITE INSPECTION

(NO SAMPLING VISIT)

Region VI, Technical Compliance Section

FACILITY'S NAME(S): CECOS International, Inc.

EPA I.D. NUMBER: TXD091270017

ADDRESS: P.O. Box 6509, Odessa, Texas 79767

LOCATION: 2407 East Murphy Road, Odessa, Texas 79767

SITE DESCRIPTION: Injection Well

DATE OF INSPECTION: March 15, 1988 VSI CONDUCTED BY: Bobby Williams - EPA
Youngmoo Kim - EPA

PREPARED BY: B. Williams - EPA DATE PREPARED: 3-31-88

ANTICIPATED DRAFT PERMIT DATE: March 31, 1988

FACILITY STATUS: Active

ANY ON-GOING STATE/FED 264, 265, OR 270 CORRECTIVE ACTION OR CERCLA ACTION: No

DOES FACILITY HAVE A CERLCA FILE? YES X NO ____

When was the CERCLA PA/SI performed at this facility: March 13, 1981

DOES FACILITY HAVE UIC WELL? YES X NO ____ TYPE: Class I

TYPE OF DRINKING WATER SUPPLY WITHIN A 3-MILE RADIUS:

City water with some private water wells.

TARGET POPULATION WITHIN A 3-MILE RADIUS:

City of Odessa, Texas, approximately 20,000 persons.

RECOMMENDATIONS: ____ R.F.I. ____ I.M. X No Further Action under RFA

(Indicate only one unless I.M. is marked)

____ 3004(u) ____ 3007

Possible Enforcement Action: ____ 3008(a) ____ 3008(h)

Form Rev. 3/30/88
gr:

I. EVALUATION

A. NUMBER OF SWMU(S)/AOC(s) INVESTIGATED DURING THE PR/VSI: 12

1. NUMBER OF SWMU(s) INVESTIGATED DURING THE PR VSI: 9

LIST OF SWMU	REGULATED BY RCRA* (SUBTITLE C)	STATUS**
1) Container Storage Area (SMWU 1)	Y	A
2) Concrete Tank (SWMU 2)	Y	A
3) Disposal Well (SWMU 3)	Y	A
4) Emergency Tank (SWMU 4)	Y	A
5) Four Filter Pots (SWMU 5)	N	A
6) Sludge Box (SWMU 6)	N	A
7) Injection Pumps and Above-ground Piping (SWMU 7)	N	A
8) Annulus Monitoring Tank (SWMU 8)	?	I
9) Concrete Sump (SWMU 9)	N	A

2. AREA OF CONCERN(s): 3

LIST OF AOC

10) Three 55-Gallon Drums (AOC A)
11) Diesel Tank (AOC B)
12) Tanker Truck Parking Area (AOC C)

* Y-Yes, N-No
** Active, Inactive, Closed (A, I, & C)

B. NUMBER SWMU TO BE INCLUDED IN THE RFI: 0
(Except RCRA units subject to Subpart F refer to Section E)

C. NUMBER OF SWMU FOR WHICH AN RFI IS NOT RECOMMENDED: 11

LIST OF SWMU	RATIONALE
1) Container Storage Area (SWMU 1)	The RCRA regulated unit is an inclined concrete truck unloading pad. The unit accepts all liquid hazardous wastes except PCBs, dioxins, water reactive acids, and hydrofloride. The unit can unload 3 tankers at the same time. A concrete wall around 3 sides varies from the surface to about 3 feet below grade. An 8-inch curb surrounds 3 sides of the unit. The Concrete Tank (SWMU 2) acts as a sump for this unit. Trucks are unloaded and rinsed on the inclined pad. The wastes and rinsate are pumped from the tankers, through the filters and into the disposal well. The unit was clean with no staining.
2) Concrete Tank (SWMU 2)	The RCRA regulated unit is located in-ground at the bottom of the inclined truck unloading area. It is constructed of concrete with steel grating covering the top. The unit holds approximately 5,000 gallons and functions as a sump collecting any spills that may occur in the truck unloading operations. During the VSI, it was observed to contain liquids to within approximately 12 inches of the grating. The liquids had a strong organics aroma.
3) Emergency Storage Tank (SWMU 4)	The RCRA regulated unit is located above-ground and is used for emergen- only. The tank is closed and can contain 1,000 gallons of waste. Two 55-gallon drums containing activated charcoal is connected to the tank to control odors from the tank. It is surrounded by a curb approximately 2 feet high with a concrete pad. The tank was empty with no staining.

LIST OF SWMU	RATIONALE
4) Four Filter Pots (SWMU 5)	The units filters are used to filter the wastes prior to injection into the disposal well. The spent filters are removed about every 4 months and placed in the Sludge Box Area (SWMU 6) for transport to CECOS International in Livingston, Louisiana. The pots are located on a concrete pad and surrounded by a concrete curb. The pots were clean with no staining.
5) Sludge Box (SWMU 6)	The unit is a large steel container used for temporary storage of spent filters and sludges. The container is located within the concrete berm of the Container Storage Area (SWMU 1) which has a below-ground Concrete Tank (SWMU 2) to catch spills. The contents of the Sludge Box are taken to CECOS International in Livingston, Louisiana for disposal. The unit was clean with no staining.
6) Injection Pumps and Above-Ground Piping (SWMU 7)	The pumps and pipe are located on a concrete pad with a concrete curb around them. The pumps and piping appeared to be well-maintained and clean. No stains were observed on the unit components.
7) Annulus Monitoring Tank (SWMU 8)	A new unused 750 gallon fiberglass tank was installed to monitor the disposal well annulus. The tank will hold brine water and is located on a concrete pad. It is surrounded by a concrete curb.
8) Concrete Sump (SWMU 9)	The disposal well is centered in a below grade concrete lined sump. The sump is about 10' x 10' x 3'and contained no liquids. It was clean with no staining.
9) Three 55-gallon Drums (AOC A)	The drums contain motor oil, soap, and sodium hypochloride. They are located on the concrete pad of the Container Storage Area (SWMU 1) and appeared to be in good shape.

10) Diesel Tank (AOC B)	The steel tank is located above-ground and has a loose soil berm around it. The fittings to the tank and the tank were clean with no stains. The soil under the tank was unstained.
11) Tanker Truck Parking Area (AOC C)	The area is a caliche pad located west of the office building. The area appeared unstained. During the VSI, three tanker trucks were parked in the area. Each of the tankers appeared clean and the fittings were well-maintained. The facility personnel stated that one empty tanker is always kept on-site to manage any emergency spills.

D. SUPPLEMENTAL INFORMATION ON RCRA REGULATED UNITS: 1
(Describe any problems identified or suspected from regulated units including identified releases to groundwater)

1) Disposal Well (SWMU 3)	The RCRA regulated unit is surrounded by a concrete curb. A concrete-lined sump is located within the curbed area. The well injection pressure for fresh water is 1,660 lbs/square inch. When 10 lb. brine water is used, the injection pressure is 1,300 lbs/square inch. The well head and surrounding area was clean with no staining. UIC will certify the well.

II. FINDINGS

A. RECOMMENDATIONS: (EPA, STATE and/or CONTRACTOR)

An RFI is not recommended for the 12 units inspected during the VSI for CECOS, International, Inc.

B. ADDITIONAL COMMENTS:

1) The Concrete Tank (SWMU 2) functions as a sump collecting any spills that may occur during the truck unloading operations. The tank contained liquids to within approximately 12 inches to the top. The liquids had strong organic odors. The plant manager said that they allow the tank to nearly fill before pumping the liquids into the disposal well. The VSI team suggested that company policy should change and keep the tank empty of liquids at all times. The practice of allowing the liquids

to collect for a period of time before disposal apparently has continued for several years. The October 1985, State inspection noted that the liquids are not promptly removed. The prompt removal of liquids collected in the tank should be a condition of the HSWA Permit.

2) The inspections performed by TWC in 1986 and 1987 describe the Concrete Tank (SWMU 2) as being 20" deep. They also state that freeboard is adequately maintained at 2 feet or greater. The only way that the freeboard can be maintained at 2 feet or greater is if the Concrete Tank overflows into the Container Storage Area (SWMU 1).

CONCUR: Lydia M. Boada Clista DATE: 3/31/88

LYDIA M. BOADA CLISTA

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cc: Sam Becker (6H-C) - w/o Attachment

RCRA FACILITY ASSESSMENT

CECOS INTERNATIONAL, INC.
ODESSA, TEXAS
EPA ID No. TXD091270017

Prepared by:
U.S. Environmental Protection Agency
Region VI
Hazardous Waste Compliance Branch
Technical Section
1445 Ross Avenue
Dallas, Texas 75202

JUNE 1988

TABLE OF CONTENTS

1.0 INTRODUCTION

The purpose of this report is to document the RCRA Facility Assessment for Cecos International, Inc., Odessa, Texas. The Preliminary Review (PR) and Visual Site Inspection (VSI) are the two phases in the Resource Conservation and Recovery Act (RCRA) Facility Assessment under the RCRA corrective action program. The information in Sections 1.1 and 1.2 has been developed from the RCRA Facility Assessment Guidance (Ref. 1).

1.1 Hazardous and Solid Waste Amendments and other Authorities

The Hazardous and Solid Waste Amendments of 1984 (HSWA) provided the United States Environmental Protection Agency (EPA) with the authority to require corrective action at RCRA treatment, storage, and disposal (TSD) facilities. The new authorities are:

- 3004(u) - Corrective Action for Continuing Releases
  Requires that any permit issued after November 8, 1984, provide for corrective action for all releases form solid waste management units (SWMUs) at the facility. The provision also insists that owner/operators demonstrate financial assurance for any required corrective action, and allows schedules of compliance to be used in permits where the corrective action cannot be completed prior to permit issuance.

- 3008(h) - Interim Status Corrective Action Orders
  Provides authority to issue enforcement orders to compel corrective action or other response measures at interim status facilities, as well as authority to take civil action against facilities for appropriate relief.

- 3004(v) - Corrective Action Beyond the Facility Boundary
  Directs EPA to issue regulations requiring corrective action beyond the facility boundary where necessary to protect human health and the environment. The only exception to this is if the owner/operator can demonstrate that he is unable to obtain permission to take corrective action on off-site property. Until the regulations requiring corrective action beyond the facility boundary are promulgated, corrective action orders may be issued to require the necessary corrective action.

The 3004(u) provision focuses on investigating releases from solid waste management units at RCRA facilities. SWMUs are defined as "any discernible (solid) waste (as defined in 40 CFR 261.2) unit at a RCRA facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste" (Ref. 2). The SWMU definition includes containers; tanks; surface impoundments; waste piles; land treatment units; landfills; incinerators; underground injection wells; waste water treatment units; recycling units; and areas contaminated by routine and systematic discharges from process areas. The 3008(h) authority applies to any release from an interim status TSD facility. Other authorities under RCRA that apply include:

- 3005(c) - Permit Issuance
  Authorizes EPA, upon determination that a facility is in compliance with sections 3004 and 3005 of RCRA, to issue permits to TSD facilities that have applied for such permits.

- 3007 - Inspections
  Permits EPA to enter, inspect, sample, and examine records of any generator or TSD facility for purposes of developing any regulation or enforcing the provisions of RCRA.

- 3008(a) - Compliance Orders
  In case of a violation of Subtitle C - Hazardous Waste Management, this section authorizes EPA either to issue an order assessing a civil penalty and/or requiring compliance, or to commence a civil action for appropriate relief.

- Section 3013 - Monitoring, Analysis, and Testing
  Provides authority to order a hazardous waste TSD facility to perform monitoring, analysis and testing at the site, if there is a potential for a substantial hazard to human health or the environment. If the facility cannot perform the work, either EPA may perform or EPA may authorize the State to perform the monitoring.

- Section 7003 - Imminent Hazard
  Authorizes EPA to bring suit to stop handling, transportation, treatment, storage and disposal of a solid or hazardous waste if an "imminent or substantial endangerment to health or the environment": is present. Also, other action as necessary may be taken.

1.2 RCRA Corrective Action Program

The RCRA corrective action program based on the HSWA authorities consists of four phases:

(1) The RCRA Facility Assessment (RFA) to identify releases or potential releases of hazardous wastes or constituents requiring further investigation.

(2) The RCRA Facility Investigation (RFI) to verify releases, to determine the nature and extent of releases, and to gather all necessary data to support the corrective measure study.

(3) The Corrective Measures Study (CMS) to develop and evaluate the corrective measure alternative(s) and to recommend corrective measure(s) to be taken.

(4) Corrective Measures Implementation (CMI) to design, construct, operate, maintain, and monitor the performance of the corrective measure(s) selected to protect human health and the environment.

In particular, the intent of the RFA is to identify and gather information on releases at RCRA facilities, to evaluate solid waste management units for hazardous releases to all media, and to make preliminary determinations regarding releases of concern and the need for further actions and interim measures at the facility. The RFA consists of potentially three phases: (1) the Preliminary Review (PR), (2) the Visual Site Inspection (VSI), and (3) the Sampling Visit (SV), if necessary. The PR focuses on evaluating existing data in the form of the inspection reports, permit applications and historical monitoring data, at EPA and state regulatory offices. The VSI is the second phase of the RFA and consists

of a visit to the site to collect visual information to assist in determining whether releases have occurred. The optional third phase of the RFA is the SV, which may be used to fill data gaps, if any remain after completion of the PR and VSI.

1.3 Contents of this Report

This report presents the results of the PR and VSI of the Cecos International, Inc. facility in Odessa, Texas. The principal sources of information used in conducting the PR included the facility's permit application to Texas Water Commission (TWC); and correspondence from and to TWC (Ref. 3). These documents were obtained during search of relevant files at the EPA Refional Office in Dallas.

The VSI was conducted March 15, 1988. The Cecos representatives present were David Dallas, District Manager and Mark Kasper, Technical Manager. EPA's representatives were Bobby Williams and Youngmoo Kim from Region VI Hazardous Waste Compliance Branch, Technical Section. This report was prepared by Bobby Williams.

Section 2.0 of this report contains a description of the Cecos property, including operations and identification of the SWMUs. Section 3.0 provides an overview of the environmental setting at the facility comprising: (1) climate and meteorology, (2) floodplain and surface water, (3) geology and soils and (4) groundwater. Section 4.0 contains detailed discussions of each SWMU, including the potential for releases to soil, groundwater, surface water, and air. Secton 5.0 covers conclusions and recommended actions. Section 6.0 provides a list of references. The VSI photograph log is presented as an appendix to the report.

2.0 DESCRIPTION OF THE FACILITY

This section of the PR/VSI report covers the location of the Cecos facility, the operations, a brief description of the SWMUs that were identified, and the wastes managed at the facility.

2.1 Location

The Cecos International, Inc. facility is located in Ector County on a 50 acre site located approximately 1 1/2 miles east of Odessa, Texas, on Murphy Road (Figure 1). Of the 50 acres owned by Cecos, 2.97 acres are fenced and used as part of the active facility. The facility is at 31° 51' 02" north latitude and 102° 19' 35" west longitude.

2.2 Operations

Cecos operates a facility which consists of one (1) disposal well, four (4) filter pots, one (1) sump, one (1) sludge box, one (1) truck unloading area that is capable of unloading four trucks at once, one (1) 1,000 gallon emergency waste storage tank, one (1) annulus monitoring system, and two (2) inspection pumps. The 50 acre facility is centered on the injection well. The property serves as a disposal facility for liquid organic and inorganic wastes.

The facility has been in operation since 1980. The facility is not authorized to handle PCBs, dioxins, water reactive acids, or hydrogen fluoride. Cecos is authorized to accept cyanides, phenols, and benzenes.

Before the wastes are accepted by the facility, samples are sent to Houston, Texas for analysis. Texas Water Commission approves the wastes prior to acceptance by the facility for injection.

When the facility accepts wastes, the tank trailers are unloaded and the wastes are injected directly into the well. No wastes are stored or mixed at the Cecos facility. At least one empty tank truck is kept at the facility in case of an emergency. The pressure when fresh water is used for injection is 1660 pounds per square inch (psi). When ten-pound brine water is used, the injection pressure is 1300 psi.

2.3 Identification of Solid Waste Management Units

Nine solid waste management units (SWMUs) and three Areas of Concern (AOCs) have been identified for the Cecos International, Inc. facility at Odessa, Texas as a result of the PR and VSI. A list of SWMUs and AOCs is presented in Table 1. One of the SWMUs is permitted under UIC and RCRA.

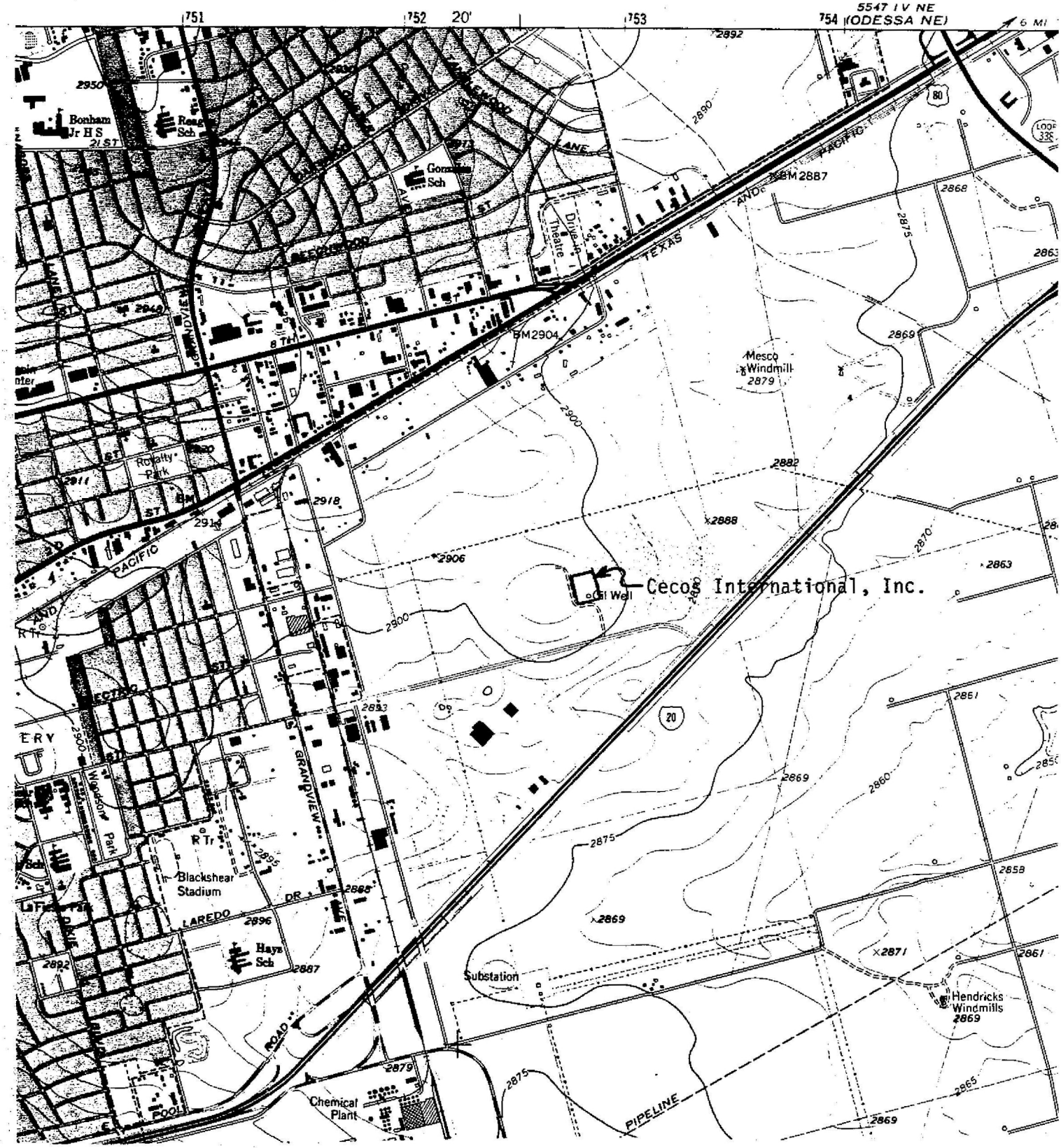


Figure 1
Location Map of the
Cecos International, Inc. Facility
at Odessa, Texas

Table 1

Solid Waste Management Units
at Cecos International, Inc.
Odessa, Texas

SWMU No.	NAME	RCRA REGULATED SWMU	STATUS
1.	Container Storage Area	No	Active
2.	Concrete Tank	No	Active
3.	Disposal Well	Yes	Active
4.	Emergency Tank	No	Active
5.	Four Filter Pots	No	Active
6.	Sludge Box	Yes	Active
7.	Injection Pumps and above ground piping	No	Active
8.	Annulus Monitoring Tank	?	Inactive
9.	Concrete Sump	No	Active

4.0 SOLID WASTE MANAGEMENT UNITS

Nine Solid Waste Management Units (SWMUs) have been identified from the files for the Cecos International, Inc. facility. These SWMUs include one (1) container storage area, one (1) concrete tank, one (1) disposal well, one (1) emergency tank, one (1) filter pots unit, one (1) sludge box, two (2) injection pumps and above-ground piping, one (1) annulus monitoring tank, and one (1) concrete sump.

Detailed descriptions of each SWMU identified in the PR and VSI are presented in this section. These descriptions include the SWMU description; wastes to be managed; and release potential to soil/groundwater, surface water, air, and subsurface gas.

4.1 SWMU #1 Container Storage Area

4.1.1 Information Summary

Unit Description

The area is located in a portion of the truck unloading ramp. The ramp is constructed of concrete which slopes from three inches above ground level to approximate 36 inches below ground level. A concrete curb surrounds the truck unloading ramp. An in-ground concrete tank serves as a sump for the ramp area. A large steel container is used for temporary storage of sludges and used filter cartridges. The sludges are taken to Cecos International in Louisiana.

Wastes Managed

The unit contains used filter cartridges from the injection process, contaminated protective clothing and rags, old hoses and valves, diesel-contaminated soil from the fuel tank, and contaminated sludge from the below-grade tank. Waste storage is for less than 90 days.

4.1.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low due to the concrete pad and concrete curb around the area.

- Surface Water: The potential for release to surface water from this unit is low due to the design of the unit and the containment curb around it.

- Air: The potential for release to the air is moderate because the wastes are placed in a dumpster-type container which is not closed.

- Subsurface Gas: The potential of subsurface gas generation is low due to the unit design and it is located above-grade.

4.2 SWMU #2 Concrete Tank

4.2.1 Information Summary

Unit Description

The in-ground open-top tank is constructed with concrete. The top is covered by steel grating. The dimensions are 10' x 40' x 20". The concrete walls are approximatedly 6 inches thick. The unit is located at the bottom of the truck unloading ramp and serves as a sump to collect spills. The wastes are pumped from the tank through filters and to the disposal well.

Wastes Managed

The unit receives washwater from interior washing of tanker trucks, storm-water, lubricating oils from pump leaks and spills from trucks unloading. The tank may contain all listed wastes authorized for disposal at the facility. The storage of the wastes is for less than 90 days.

4.2.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low because liquids are left standing in the tank. The state has noted that there is no method for the inspection of the tank. During the VSI, approximately twelve inches of liquids were noted in the tank.

- Surface Water: The potential for release to surface water from this unit is low due to the design of the unit and adequate freeboard.

- Air: The potential for release to the air is high because the tank is open-top and the facility does not remove the waste immediately. During the VSI, organics were observed in the tank.

-Subsurface Gas: The potential of subsurface gas generation is moderate if a leak developed in the tank.

4.3 SWMU #3 Disposal Well

4.3.1 Information Summary

Unit Description

The disposal well is an oil and gas exploration well that was drilled to 10,001 feet. The well casing top is at 7,752 feet. The casing is plugged with cement from 8,817 feet to 9,040 feet. Another cement plug is located from 5,750 feet to 5,850 feet. The disposal well is triple cased and cemented. The largest casing in the disposal well is 13 3/8 inch and extends from the surface to 407 feet. The next string of casing is 9 5/8" casing that extends from the surface to 5,798 feet. Seven inch casing is cemented inside the outer casing from the surface to a depth of 4,808 feet. The 9 5/8" casing

is perforated in the injection zone from 4,900 feet to 5,605 feet. The wastes are injected into the San Andres formation which is a limestone and dolomite rock unit. The wastes are pumped down a string of 2 7/8" plastic-coated steel tubing. The tubing extends from the surface to 4,805 feet in depth. A packer is set around the tubing at 4,785 feet. The drill hole is an open-hole between the cement plug set at 5,750'-5,850' and the top of the casing at 7,752 feet.

Wastes Managed

The wastes that are injected into the disposal well are liquid organic and inorganic wastes. Cyanides, phenols, benzenes, halogenated and non-halogenated solvents, ignitable liquids, reactive liquids, and corrosive liquids are among the wastes that are authorized to be injected into the well.

4.3.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater is low from the disposal well because the hole is triple cased and cemented. The unit has an annular monitoring system and a sump around the well head to collect any leaks or spills.

- Surface Water: The potential for release to surface water from this unit is low due to the unit being a closed system.

- Air: The potential for release to the air from this unit is low due to the unit being a closed system.

- Subsurface Gas: The potential of subsurface gas generation is high because of the injection of wastes into the earth. However, the gas generation has a low potential to migrate to the surface because the injection zone is at least 4,900' deep.

4.4 SWMU #4 Emergency Tank

4.4.1 Information Summary

Unit Description

The above-ground fiberglass tank is used for emergencies only. The capacity of the tank is 5,000 gallons. Two 55-gallon barrels containing activated charcoal is attached to the tank to control odors. The tank is located on a concrete pad with a two foot concrete containment curb around it.

Wastes Managed

The wastes managed by the unit include liquid organics and inorganics that are authorized for injection in the disposal well. These wastes include cyanides; phenols; benzenes; halogenated and non-halogenated solvents; and ignitable, corrosive, and reactive aqueous wastes.

4.4.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low due to the design of the tank and the controls to prevent spills.

- Surface Water: The potential for release to surface water from this unit is low due to the design of the tank and the containment dike constructed around the tank.

- Air: The potential for release to the air is low because the tank is closed.

- Subsurface Gas: The potential for subsurface gas generation is low due to the tank design and it is located above-grade.

4.5 SWMU #5 Four Filter Pots

4.5.1 Information Summary

Unit Description

The filter pots are connected in series. Two of the filter pots contain 25 micron filters and the remaining two filter pots contain 5 micron filters. The wastes are filtered through the 25 micron filters prior to passing through the 5 micron filters. After filtering, the wastes are injected into the disposal well. The filter pots are located above-ground on a concrete pad with a concrete containment curb around them. The used filter cartridges are removed and stored on the container storage area until they are taken off-site to Cecos International in Louisiana.

Wastes Managed

The filters are contanimated with all wastes that are authorized to be injected into the disposal well. These wastes include cyanides; phenols; benzenes; halogenated and non-halogenated solvents, and ignitable, corrosive, and reactive wastes.

4.5.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low due to the design of the filter pots and the controls to prevent spills.

- Surface Water: The potential for release to surface water from this unit is low due to the design of the filter pots and the concrete pad and containment dike constructed around them.

- Air: The potential for release to the air is low because the filter pots are closed units.

- Subsurface Gas: The potential for subsurface gas generation is low due to the filter pot design and they are located above-grade.

4.6 SWMU #6 Sludge Box

4.6.1 Information Summary

Unit Description

The sludge box is a large steel dumpster type container located on the truck unloading ramp. The box has a hinged steel door on the top of it. The waste are stored in the unit less than 90 days before they are transported to CECOS International in Livingston, Louisiana or Rollins in Houston, Texas. The truck unloading ramp has a concrete pad, concrete containment walls, and a concrete tank that serves as a sump.

Wastes Managed

The sludge box contains solid wastes consisting of contaminated sludge from the concrete tank, used filter, contaminated protective clothing and rags and used hoses.

4.6.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low due to the concrete pad and containment dikes to control spills.

- Surface Water: The potential for release to surface water from this unit is low due to the concrete pad and concrete containment dikes around it.

- Air: The potential for release to the air is low because the sludge box is closed.

- Subsurface Gas: The potential for subsurface gas generation is low due to the units location above ground.

4.7 SWMU #7 Injection Pumps and above-ground Piping

4.7.1 Information Summary

Unit Description

Two injection pumps remove wastes from the tanker trucks through the filter pots and into the disposal well. The piping from the pumps to the well head are all constructed of steel and are located above-ground. The pumps are on a concrete pad with a two foot concrete dike around them. Most of the piping is also within the concrete dike area. The pump pressure is continuously monitored and an emergency tank is available to divert the wastes if problems develop during injection.

Wastes Managed

The units manage all aqueous wastes that are authorized to be injected into the disposal well. These waste include cyanides; phenols; benzenes; halogenated and non-halogenated solvents; and ignitable, corrosive, and reactive wastes.

4.7.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low due to the design of the unit and the containment dike constructed around the pump area.

- Surface Water: The potential for release to surface water from this unit is low due to the design of the unit and the containment dike constructed around the pump area.

- Air: The potential for release to the air is low because the unit is a closed unit.

- Subsurface Gas: The potential for subsurface gas generation is low due to the unit design and it is located above-grade.

4.8 SWMU #8 Annulus Monitoring Tank

4.8.1 Information Summary

Unit Description

The annulus monitoring tank was recently installed but was not operational at the time of the VSI. The fiberglass tank has a capacity of 750 gallons and is designed to hold wastes that may back flush from the disposal well. The tank is located next to the injection pumps and filter pots on a concrete pad. A two foot concrete dike surrounds the tank.

Wastes Managed

The unit will manage all aqueous wastes that are authorized to be injected into the disposal well. These wastes include cyanides; phenols; benzenes; halogenated and non-halogenated solvents; and ignitable, corrosive, and reactive wastes.

4.8.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low due to the design of the tank and the controls to prevent spills.

- Surface Water: The potential for release to surface water from this unit is low due to the design of the tank and the containment dike constructed around the tank.

- Air: The potential for release to the air is low because the tank is a closed unit.

- Subsurface Gas: The potential for subsurface gas generation is low due to the tank design and it is located above-grade.

4.9 SWMU #9 Concrete Sump

4.9.1 Information Summary

Unit Description

The concrete sump surrounds the disposal well and is designed to catch any spills from the well head. The sump has steel groting on the top. The below-grade unit is approximately 6 feet x 6 feet x 3 feet and has an 8 inch concrete curb around it. The unit has a concrete pad in the bottom of it. Any wastes that leak into the sump will be re-injected into the well.

Wastes Managed

The unit manages all wastes that are authorized to be injected into the disposal well. These wastes include cyanides; phenols; benzenes; halogenated and non-halogenated solvents; and ignitable, corrosive, and reactive wastes.

4.9.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low due to the design of the sump and the controls to prevent spills.

- Surface Water: The potential for release to surface water from this unit is low due to the design of the sump and the containment dike to be constructed around the tank.

- Air: The potential for release to the air is low because the sump is a closed unit.

- Subsurface Gas: The potential for subsurface gas generation is low due to the sump design and it is located above-grade.

5.0 CONCLUSIONS AND RECOMMENDATIONS

All of the SWMUs at the CECOS International site appear to be well designed and in good condition for hazardous waste disposal. The units appear to have adequate containment systems to contain any releases that may occur at the site. The disposal well is triple cased and cemented for the upper 407 feet. The hose hole is double cased to a depth of 4,808 feet.

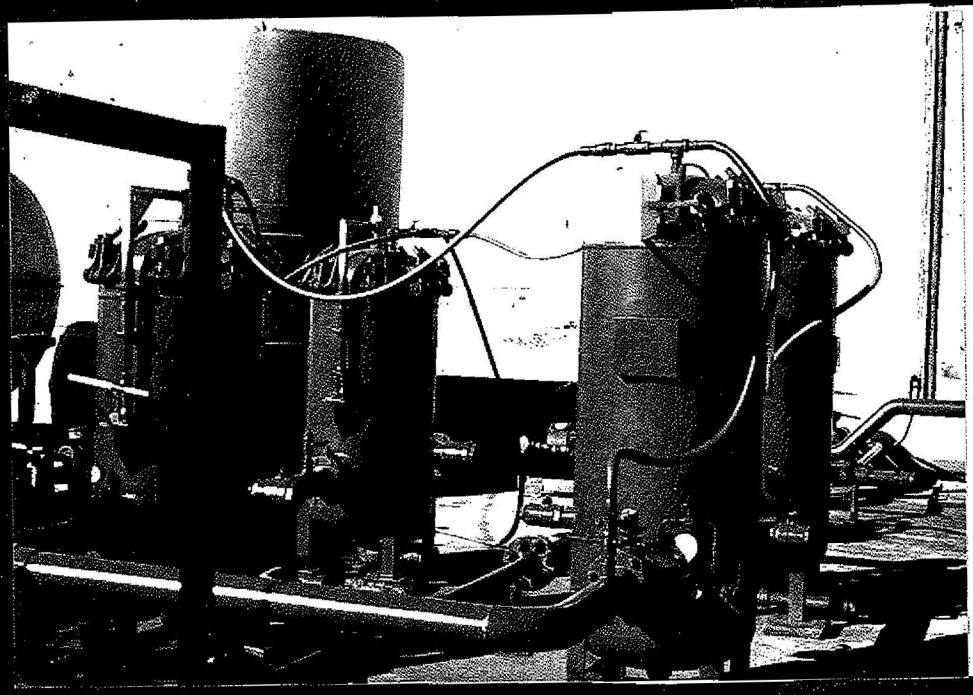
The Concrete Tank (SWMU 2) serves as a sump for the truck unloading ramp and for the pumps, filter pots and annulus monitoring tank. The tank contained organics during the VSI. Since there is no record of the tank inspection and it may be considered an in-ground sump, the unit should be emptied immediately after it collects wastes.

6.0 REFERENCES

1. U.S. EPA, RCRA Facility Assessment Guidance, 1986.

2. National RCRA Corrective Action Strategy, Memorandum from J. Winston Porter; Assistant Administrator, OSWER, to Hazardous Waste Division Directors, Regions I-X, dated October 14, 1986.

3. Solid Waste Compliance Monitoring Inspection Report, TWC Registration Number 34087, Texas Water Commission, dated May 5, 1987, December 18, 1986, and October 9, 1985.

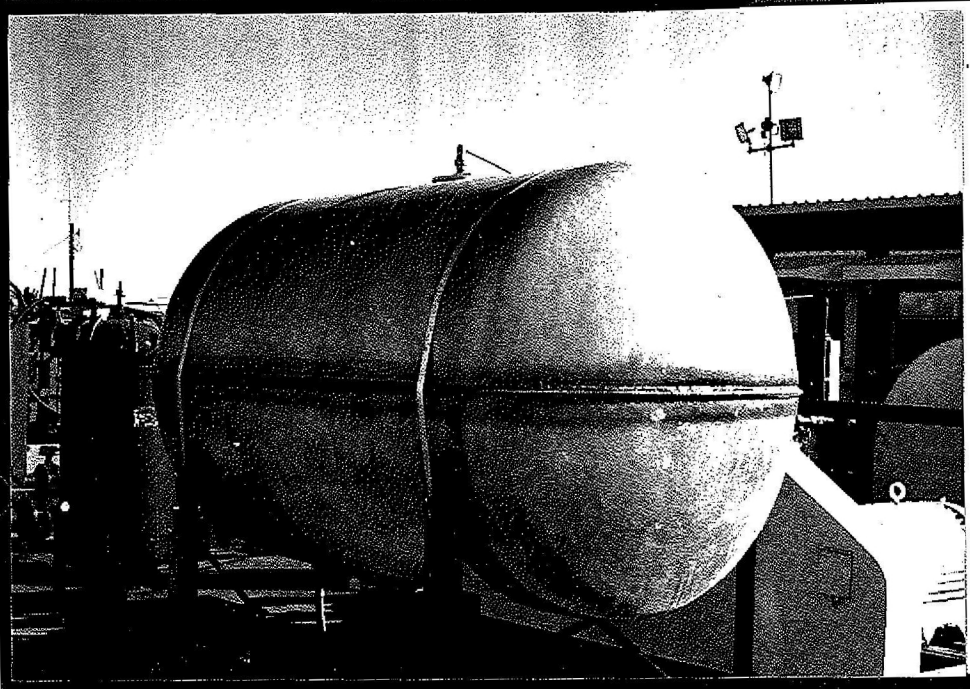


OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Four Filter Pots (SWMU 5)
LOCATION: Cecos International, Inc
2407 East Murphy Road
CITY: Odessa COUNTY: Ector STATE: TX
DATE: 3/15/88 TIME:
WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Bobby Williams
WITNESS:
CAMERA: Nikkomat 35 mm
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: of

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Sludge Box (SWMU 6)
LOCATION: Cecos International, Inc
2407 East Murphy Road
CITY: Odessa COUNTY: Ector STATE: TX
DATE: 3/15/88 TIME:
WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Bobby Williams
WITNESS:
CAMERA: Nikkomat 35 mm
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: of



OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Annulus Monitoring Tank
LOCATION: Cecos International, Inc
2407 East Murphy Road
CITY: Odessa COUNTY: Ector STATE: TX
DATE: 3/15/88 TIME:
WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Bobby Williams
WITNESS:
CAMERA: Nikkomat 35 mm
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: of

OFFICIAL PHOTOGRAPH

U.S. ENVIRONMENTAL PROTECTION AGENCY

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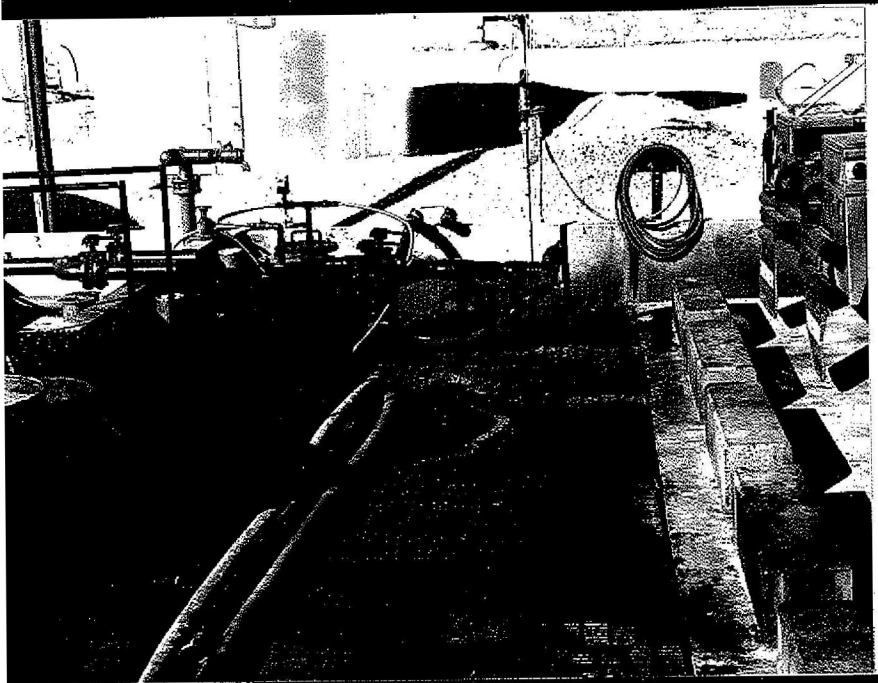
SUBJECT: Concrete Tank (SWMU 2)
LOCATION: Ceco International Inc
2407 East Murphy Road
CITY: Odessa COUNTY: Ector STATE: TX
DATE: 3/15/88 TIME:
WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Bobby Williams
WITNESS:
CAMERA: Nikkormat 35 mm
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: of



OFFICIAL PHOTOGRAPH

U.S. ENVIRONMENTAL PROTECTION AGENCY

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SUBJECT: Concrete Tank (SWMU 2)
LOCATION: Ceco International Inc
2407 East Murphy Road
CITY: Odessa COUNTY: Ector STATE: TX
DATE: 3/15/88 TIME:
WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Bobby Williams
WITNESS:
CAMERA: Nikkormat 35 mm
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NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: of

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Fuel Storage Tank
LOCATION: Cecos International, Inc
2407 East Murphy Road
CITY: Odessa COUNTY: Ector STATE: TX
DATE: 3/15/88 TIME: _____
WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Bobby Williams
WITNESS: _____
CAMERA: Nikkormat 35 mm
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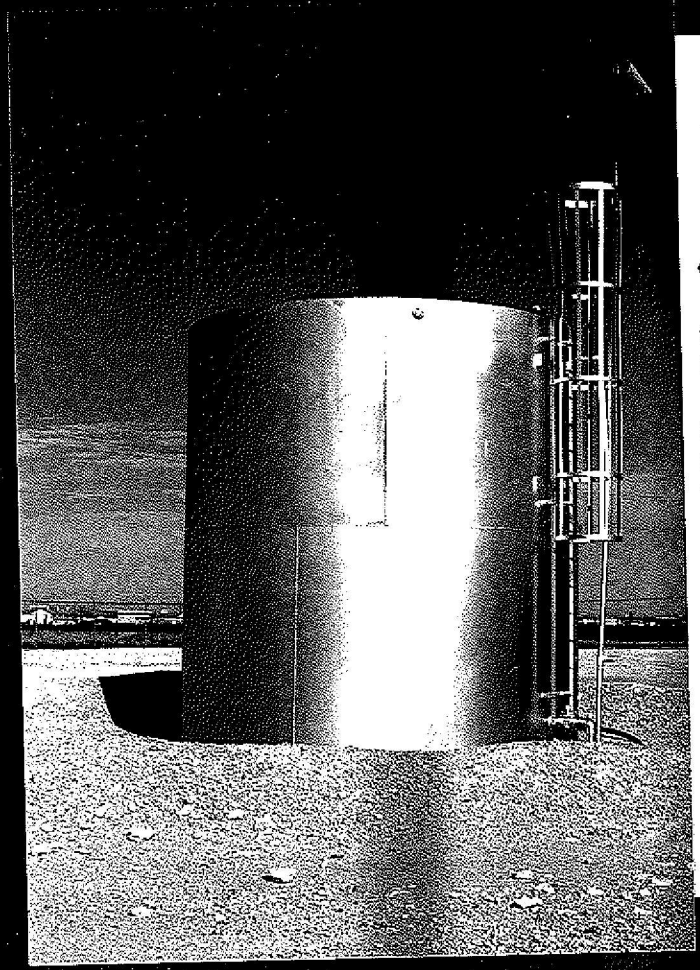

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Brine Storage Tank
LOCATION: Cecos International, Inc
2407 East Murphy Road
CITY: Odessa COUNTY: Ector STATE: TX
DATE: 3/15/88 TIME: _____
WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Bobby Williams
WITNESS: _____
CAMERA: Nikkormat 35 mm
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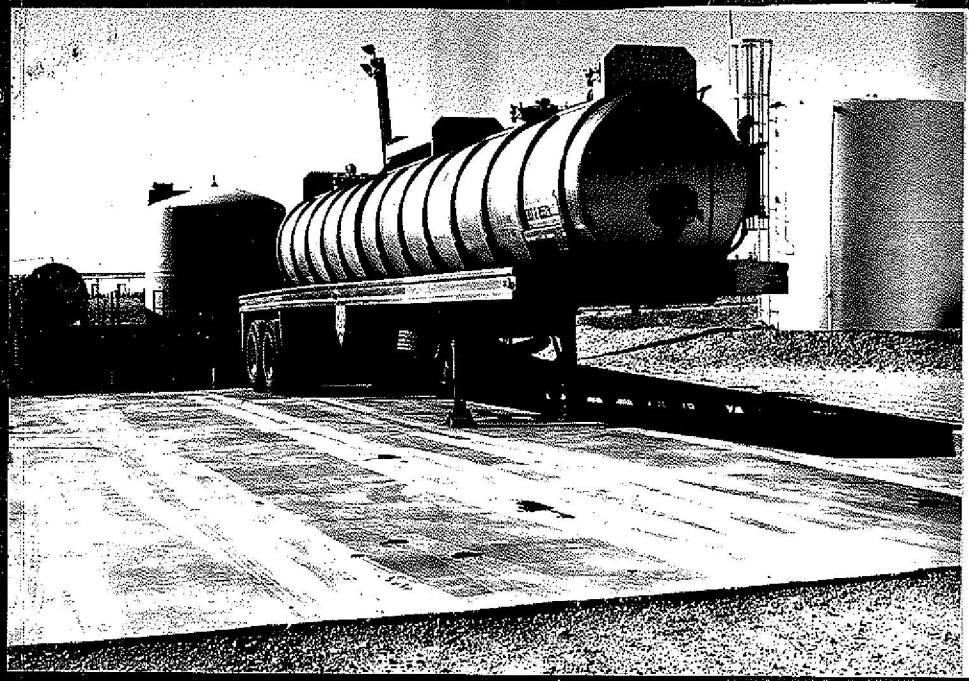

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Truck Loading Area
LOCATION: Cecos International, Inc
2407 East Murphy Road
CITY: Odessa COUNTY: Ector STATE: TX
DATE: 3/15/88 TIME:
WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Bobby Williams
WITNESS:
CAMERA: Nikkomat 35 mm
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: of

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Disposal Well (SWMU 3)
LOCATION: Cecos International, Inc
2407 East Murphy Road
CITY: Odessa COUNTY: Ector STATE: TX
DATE: 3/15/88 TIME:
WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Bobby Williams
WITNESS:
CAMERA: Nikkomat 35 mm
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: of

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Injection Pumps and above Ground Piping (SWMU 7)
LOCATION: Cecos International, Inc
2407 East Murphy Road
CITY: Odessa COUNTY: Ector STATE: TX
DATE: 3/15/88 TIME:
WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Bobby Williams
WITNESS:
CAMERA: Nikkomat 35 mm
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
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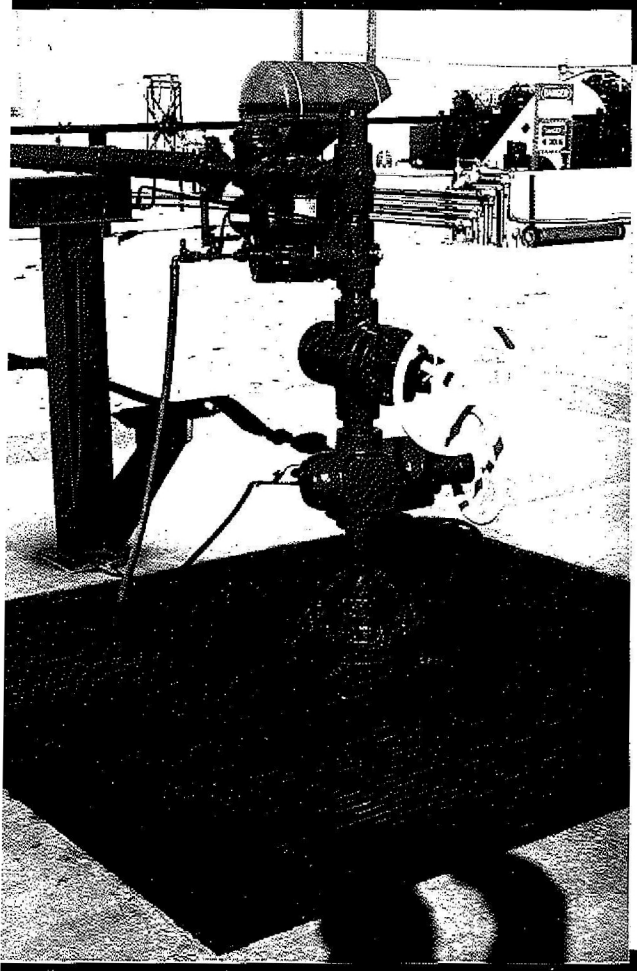

OFFICIAL PHOTOGRAPH

U.S. ENVIRONMENTAL PROTECTION AGENCY

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SUBJECT: Concrete Sump (SWM09)
LOCATION: Cecos International Inc
2407 East Murphy Road
CITY: Odessa COUNTY: Ector STATE: TX
DATE: 3/15/88 TIME:
WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Bobby Williams
WITNESS:
CAMERA: Nikkomat 35 mm
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
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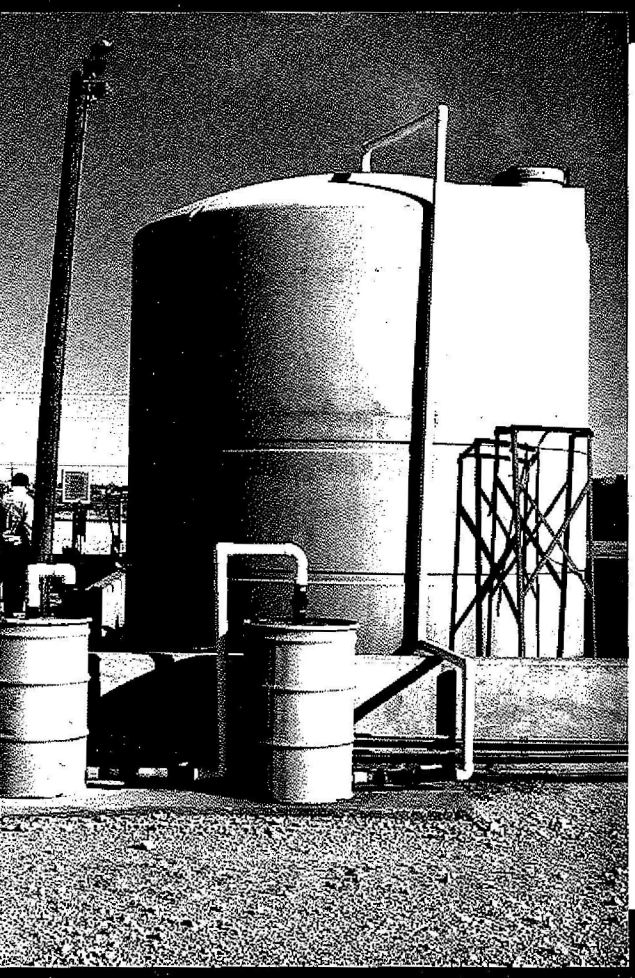
PHOTO #: of



OFFICIAL PHOTOGRAPH

U.S. ENVIRONMENTAL PROTECTION AGENCY

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SUBJECT: Emergency Tank (SWM14)
LOCATION: Cecos International Inc
2407 East Murphy Road
CITY: Odessa COUNTY: Ector STATE: TX
DATE: 3/15/88 TIME:
WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Bobby Williams
WITNESS:
CAMERA: Nikkomat 35 mm
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
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